UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ELIZABETH R. PADDOCK,

Plaintiff,

v.

PEACEHEALTH, INC. d/b/a ST. JOSEPH'S MEDICAL CENTER and PEACEHEALTH MEDICAL GROUP, BELLINGHAM ANESTHESIA ASSOCIATES, P.S., FOURTH CORNER NEUROSURGICAL ASSOCIATES, INC., P.S., NORTHWEST RADIOLOGISTS, INC., P.S., DAVID E. BAKER, M.D. JASON M. STOANE, M.D., PAUL B. FREDETTE, M.D., JOHN E. MORRISON, M.D., CAMILLE A. MILLER, M.D., and TUNG M. HA, D.O.,

Defendants.

NO. 2:21-cv-00639 JHC

STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE OF DEFENDANT CAMILLE MILLER, M.D.

STIPULATION

All parties, by and through their respective counsel of record, hereby stipulate and agree that any and all claims and causes of action that were or could have been brought by Plaintiff against Defendant Camille Miller, MD. herein, are dismissed with prejudice and without costs and fees to any party.

Defendants PeaceHealth, Inc. d/b/a St. Joseph's Medical Center, PeaceHealth Medical Group, Bellingham Anesthesia Associates, PS, Fourth Corner Neurosurgical Associates, Inc., Northwest Radiologists, Inc., PS, David E. Baker, MD, Jason M. Stoane, MD, Paul B. Fredette, MD, John E. Morrison, MD, and Tung M. Ha, DO further stipulate and agree that they will not allege that Camille Miller, MD, is at fault in this matter or that the care she provided Plaintiff

STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE OF DEFENDANT CAMILLE MILLER, M.D. – 1

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1	was below the standard of care, or that her actions and/or failures to act, caused any injury or	
2	harm to plaintiff. Defendants PeaceHealth, Inc	. d/b/a St. Joseph's Medical Center, PeaceHealth
3	Medical Group, Bellingham Anesthesia A	ssociates, P.S., Fourth Corner Neurosurgical
4	Associates, Inc., Northwest Radiologists, Inc.,	P.S., David E. Baker, MD, Jason M. Stoane, MD,
5	Paul B. Fredette, MD, John E. Morrison, MD, and Tung M. Ha, DO, further stipulate and agree	
6	that they will not seek to allocate fault against Dr. Miller pursuant to RCW 4.22.070.	
7 8	DATED this 5 th day of January, 2023.	
9	FAIN ANDERSON VANDERHOEF ROSENDAHL O'HALLORAN SPILLANE	FAIN ANDERSON VANDERHOEF ROSENDAHL O'HALLORAN SPILLANE
10	s/ Scott M O'Halloran, WSBA #25236 s/ Erin E. Ehlert, WSBA #26340	s/ Ketia B. Wick, WSBA #27219 s/ Caleb T. Mathena, WSBA #57001
11	Counsel for Defendant Fourth Corner Neuro, Drs Baker and Ha	
12	1301 A St Ste 900, Tacoma, WA 98402 Phone: (206) 328-7800	Phone: (206) 328-7800 Email: scott@favros.com, erine@favros.com
13	Email: scott@favros.com, erine@favros.com	
14	HART WAGNER LLP	JOHNSON GRAFFE KEAY MONIZ & WICK
15	s/ Donna L. Lee, WSBA #42395 s/ Gordon L. Welborn, WSBA #23769	s/ Philip deMaine, WSBA # 28389 s/ Brennen Johnson, WSBA # 51665
16 17	Attorney for Defendant NW Radiologist, Stoane MD 1000 SW Broadway Fl 20, Portland, OR 97205	Counsel for Bellingham Anesthesia, Morrison MD 2115 N 30th St Ste 101, Tacoma, WA 98403
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19	JOHNSON GRAFFE KEAY MONIZ & WICK	MOSELEY COLLINS LAW
20	s/Miranda K. Aye, WSBA #40582 s/Aida Babahmetovic, WSBA #53207	s/ John J. Kinney, WSBA #53905 Counsel for Plaintiff
21	Attorney for Defendant Camille Miller, MD HolmesK@jgkmw.com, AyeM@jgkmw.com	701 5 th Ave, #4200, Seattle WA 98104 Phone: 206-333-2960
22	BENNETT BIGELOW & LEEDOM, PS	Email: john@moseleycollins.com
23	s/Jennifer Moore, WSBA #30422	
24	s/Lauren M. Martin, WSBA #49026 Attorneys for Defendant PeaceHealth	
25	601 Union St, Ste 1500, Seattle, WA 98101 Phone: (206) 622-5511	
26	Email: jmoore@bbllaw.com; lmartin@bbllaw.com	

1 **ORDER** Having come before the Court upon the Parties' Stipulation and Order of Dismissal with 2 Prejudice, and having fully considered the same and found good cause exists therefor: 3 It is hereby ORDERED, ADJUDGED, and DECREED that any and all claims and causes 4 of action which were or could have been brought by Plaintiffs against Defendant Camille Miller, 5 M.D. are hereby dismissed with prejudice and without costs and fees to any party. 6 7 DATED this 6th day of January, 2023. ohn H. Chan 8 The Honorable John H. Chun Presented By: United States District Judge 9 10 JOHNSON, GRAFFE, KEAY, MONIZ & WICK 11 s/ Miranda K. Aye, WSBA #40582 s/ Aida Babahmetovic, WSBA #53207 12 Attorneys for Defendant Miller, MD e-mail: AyeM@jgkmw.com, Aida@jgkmw.com 13 14 Approved as to form, notice of presentation waived: 15 FAIN ANDERSON VANDERHOEF FAIN ANDERSON VANDERHOEF 16 ROSENDAHL O'HALLORAN SPILLANE ROSENDAHL O'HALLORAN SPILLANE 17 s/ Scott M O'Halloran, WSBA #25236 s/ Ketia B. Wick, WSBA #27219 18 s/ Erin E. Ehlert, WSBA #26340 s/ Caleb T. Mathena, WSBA #57001 Counsel for Defendant Fourth Corner Neuro, Drs Counsel for Defendant Fredette, MD 19 701 5th Ave., Ste 4750, Seattle, WA 98104 Baker and Ha 1301 A St Ste 900, Tacoma, WA 98402 Phone: (206) 328-7800 20 Phone: (206) 328-7800 Email: scott@favros.com, erine@favros.com Email: scott@favros.com, erine@favros.com 21 HART WAGNER LLP JOHNSON GRAFFE KEAY MONIZ & WICK 22 s/ Donna L. Lee, WSBA #42395 s/ Philip deMaine, WSBA # 28389 23 s/ Gordon L. Welborn, WSBA #23769 s/ Brennen Johnson, WSBA # 51665 Counsel for Bellingham Anesthesia, Morrison MD Attorney for Defendant NW Radiologist, Stoane MD 24 1000 SW Broadway Fl 20, Portland, OR 97205 2115 N 30th St Ste 101, Tacoma, WA 98403 Phone: (503) 222-4499 Phone: (253) 572-5323 25 Email:DLL@hartwagner.com,GLW@hartwagner.com Email: phild@jgkmw.com, johnsonb@jgkmw.com 26

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3	s/Lauren M. Martin, WSBA #49026 Attorneys for Defendant PeaceHealth	Counsel for Plaintiff 701 5 th Ave, #4200, Seattle WA 98104
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